

# Exhibit 6

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

|  |   |                              |
|--|---|------------------------------|
| <b>ELIZABETH PANZARELLA and</b>                    | : |                              |
| <b>JOSHUA PANZARELLA, individually and</b>         | : |                              |
| <b>on behalf of all others similarly situated,</b> | : |                              |
| :  |   |                              |
| <b>Plaintiffs,</b>                                 | : | <b>No. 2:18-cv-03735-PBT</b> |
| :  |   |                              |
| <b>v.</b>  | : |                              |
| :  |   |                              |
| <b>NAVIENT SOLUTIONS, LLC,</b>                     | : | <b>CLASS ACTION</b>          |
| :  |   |                              |
| <b>Defendant.</b>                                  | : |                              |
| :  |   |                              |

**DECLARATION OF ROBERT COCCO**

Robert Cocco, being of lawful age, declares:

1. I have personal knowledge of the facts set forth herein.
2. I submit this declaration in support of my clients' Motion for Class Certification pursuant to Rule 23.
3. I have been admitted to practice before this Court and the Pennsylvania state courts. I am a 1987 graduate of St. Joseph's University and a 1991 graduate of the Temple University Beasley School of Law.
4. Since 2001, I have focused my practice in consumer protection litigation, including predatory mortgage lending, fair debt collection practices, auto fraud litigation, fair credit reporting, student loan disputes, and consumer class actions.
5. In 2008 and 2013, I received, respectively, a Community Leadership Award from the Pennsylvania State Senate and a Community Services Award sponsored by Pennsylvania State Senator Shirley Kitchen to recognize my legal efforts to help those victimized in abusive consumer transactions.

6. I have previously been appointed to serve as class counsel. *See Alexander v. Coast Professional* (E.D. Pa. 0:14-cv-04735); *Payne et al v. Marriott Employees Federal Credit Union*, (E.D. Pa. 2:18-cv-04009-WB); *Gregory v. Metro Auto Sales*, Phila. CCP No. 160501609.

7. I have also represented hundreds of consumer debtors in both the state and federal litigation, including the following published case holdings: (1) *McMaster v. CIT Group/Consumer Fin., Inc.*, 2006 U.S. Dist. LEXIS 28831 (E.D. Pa. 2006) and (2) *Johnson v. Chase Manhattan Bank*, 2007 U.S. Dist. LEXIS 50569 (E.D. Pa. 2007); *Whitefield v. Seterus*, --- F.Supp.3d ----2020 WL 247958.

8. In the course of my career I have presented multiple lectures or presentations related to my practice including the following:

- Speaker, Phila. Bar Assn Labor and Employment Law Committee sponsored CLE, “The Million Dollar Sentence and Other Recent Trends in Employment Background Check Litigation” on Aug. 25, 2018 (Philadelphia, PA);
- Speaker, Why the Fuss about Arbitration? American Bar Association, January 13, 2015 (New Orleans, LA);
- Speaker, Defending a Foreclosure: Helping Families Save Their Homes, LawReview CLE, August 20, 2013;
- Speaker, PREDATORY LENDING: Bringing and Defending Against Consumer Lending Lawsuits, National Business Institute, March 3, 2009;
- Speaker, The Federal and Pennsylvania Response to the Credit Crisis, Pennsylvania Bar Institute, March 18, 2009;
- Speaker, National Association of Consumer Advocates 2009 Consumer Rights Litigation Conference, National Association of Consumer Advocates, Oct. 22-25, 2009 (Philadelphia, PA);

9. My professional memberships include: the National Association of Consumer Advocates and Philadelphia Bar Association.

10. Neither I nor my co-counsel or the Named Plaintiffs have any interests that are antagonistic to the class or that would adversely affect any of us from acting as class counsel or named representatives in this action.

I swear under penalty of perjury and upon personal knowledge that the foregoing is true and correct to the best of my knowledge.

Executed on March 20, 2020

*/s/Robert P. Cocco*

Robert P. Cocco